

REMARKS

## I. INTRODUCTION

In response to the Office Action dated April 2, 2003, claims 1, 22, and 43 have been amended. Claims 1-105 remain in the application. Entry of these amendments, and re-consideration of the application, as amended, is requested.

## II. ALLOWABLE SUBJECT MATTER

Claims 64-105 have been allowed. Applicants appreciate the indication of allowable subject matter. However, Applicants traverse the rejections of the non-allowable claims as set forth in more detail below.

## III. PRIOR ART REJECTIONS

In paragraphs (1)-(2) of the Office Action, claims 1-63 were rejected under 35 U.S.C. §102(e) as being anticipated by Robinson, U.S. Patent No. 5,842,218 (Robinson).

Applicants respectfully traverse these rejections.

Independent claims 1, 22, 43 are generally directed to an invention that provides for the creation of a customized tree. Objects from one tree are selected by a user. The selected objects are located in disparate places across different branches of the original tree. Thereafter, the selected objects are linked to each other in the customized tree in a user-specified manner. Further, the amendments provide that security restrictions for accessing the selected objects are defined using the customized tree. With such capability a user may define security restrictions for the objects using the tree itself (unlike the prior art where security is established by the database itself).

The cited reference fails to teach or suggest these various elements of Applicants' independent claims.

Robinson merely describes a method, a computer program product, and a system for a reorienting categorization table. A control interface is used to select the hierarchy of categorization levels for a categorization table into a quantity of data records. Once the user selects the desired hierarchy, the categorization table will reorient itself into the chosen categorization level hierarchy with the records in their appropriate locations. This allows more flexibility and a more efficient mechanism for putting the data into a desired organization. The user may reorient the

categorization table as desired using the control interface. Robinson finds particular usefulness in a database browser wherein the database is queried for potential records according to both a desired categorization level hierarchy and constraints on the potential categorization level values within one or more of the categorization levels. In effect, this filters the records so that a selection categorization table (capable of reorientation) is created with a manageable number of pertinent and relevant data records indicated therein from the results of the query. From there, records are selected to be placed in a retrieval categorization table (also capable of reorientation). Record references may be switched back and forth between the selection categorization table and the retrieval categorization table until a final set of references indicating desired records is attained. The references for the final set of records is used to make the actual record retrieval for processing each of the entire records or a portion thereof.

Original claims 14, 35, and 56 provide for restricting access to the customized tree. As described above, the independent claims in the present invention have been amended to provide for defining security restrictions to selected objects using the customized tree (thereby providing limited access as set forth in original claims 14, 35, and 56).

In rejecting claims 14, 35, and 36, the Office Action sites col. 11, lines 55-67 of Robinson. Col. 11, lines 55-67 provide:

Begging at step 134, the database is first accessed at step 136. The database access allows the browser to make connection with the database and to query the database for the different categorization levels possible with any accompanying sub-categorizations that may be necessary. In one known embodiment of such a browser, an SQL database is used wherein the database assigns certain data fields to a known "alias" to thereby allow the browser access to given data fields in a way that can be controlled by the database designer or maintainer. Once accessed, the category levels are displayed at step 138 allowing the user to visualize the different category levels and a current hierarchy.

As described in col. 11, lines 55-67, the SQL database and access to the database is controlled by the database designer or maintainer. In this regard, an "alias" may be created by the database designer or maintainer. The alias is merely assigned to a group of fields so that a browser can access the group of fields in a way controlled by the database designer. However, contrary to the assertion in the Office Action, such a creation of an alias fails to restrict access to the customized tree. The creation of the alias merely determines a group of fields that a user can access.

Further, the "control" asserted in Robinson can merely refer to accessing the fields as a group by the alias. In this regard, there is no suggestion that security restrictions should be defined

or used. In fact, such security restrictions are not even contemplated in Robinson. Security restrictions as used in the present claims are clearly differentiable from grouping together fields so that the fields can be accessed at once (as in Robinson). The mere use of an alias that groups together fields for a browser to access does not even allude to, explicitly or implicitly, restricting access to such fields.

Further, the present claims provide for defining the restrictions using the customized tree. As described in Robinson, the alias is created by the database designer/maintainer through the SQL database and not using the categorization or sub-categorizations. Consequently, Robinson's ability to sort the records and view records in a customizable way is performed in the categorization tables that result from querying or selecting records from a database (see Figs. 8-22). In Robinson, the database designer or maintainer establishes the aliases. In this regard, Robinson's SQL database is used and assigns the data fields to the alias (see col. 11, lines 55-67). Accordingly, Robinson's categorization tables are not utilized to establish the alias or to define security restrictions. However, in the present claims, the customized tree is used to define the security restrictions. Thus, not only can a user other than the database designer/maintainer define the settings, but the customized tree is used to define such settings. The use of the customized tree in this manner provides significant advantages and is distinguishable and clearly lacking from the prior art (including Robinson).

In addition, the various elements of Applicants' claimed invention together provide operational advantages over the systems disclosed in Robinson. Further, Applicants' invention solves problems not recognized by Robinson.

Thus, Applicants submit that independent claims 1, 22, 43, 64, 78, and 92 are allowable over Robinson. Further, dependent claims 2-21, 23-42, 44-63, 65-77, 79-91, and 93-105 are submitted to be allowable over Robinson in the same manner, because they are dependent on independent claims 1, 22, 43, 64, 78, and 92, respectively, and because they contain all the limitations of the independent claims. In addition, dependent claims 2-21, 23-42, 44-63, 65-77, 79-91, and 93-105 recite additional novel elements not shown by Robinson.

IV. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

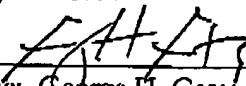
Respectfully submitted,

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